

Association of Diving Contractors International, Inc.

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Re: Comments on FHWA Docket No. FHWA-2001-8954 - 26

RIN 2125-AE86

National Bridge Inspection Standards (NBIS)

The Civil Engineering Commercial Diving Committee of the Association of Diving Contractors International (ADC) desire to offer it's comments on revisions to the FWHA's regulations on NBIS. The Committee is made up largely of registered Professional Engineers (P.E.) who are also trained in commercial dive operations. The mission of this committee is to establish proper education and training standards for engineer/divers in the private, public and government sectors throughout the United States.

Our committee has met recently to discuss these important issues and offer the following comments:

Application of Standards & Inspection Procedures

It is recommended that the NBIS inform public authorities that all inspection field operations be compliant with the US Department of Labor's Occupational Safety and Health Administration (OSHA) regulations contained in 29 CFR Part 1910 Subpart T-Commercial Diving Operations. This often-overlooked requirement can, and has led accidents and fatalities that are in large part avoidable if public authorities are made aware of this important requirement.

With regards to underwater inspection frequency we feel that the interval between underwater inspections should take into account critical variables such as construction material type, service environment, and condition rating from previous inspections. The inspection frequency for a relatively new concrete bridge pier, piling in a benign environment such as a concrete lined irrigation channel, that was previously reported to be in good condition, may not need an inspection interval of 5 years or under. On the other hand, the inspection frequency for an older timber or steel piling in an aggressive environment that was previously reported to be in only fair condition probably needs to be re-inspected every 3 years. The American Society of Civil Engineers has recently published a manual (No. 101, Underwater Investigations - Standard Practice Manual) that makes specific recommendations on this subject that we recommend the FHWA consider for inclusion in the NBIS.

Qualifications of Personnel

With regard to Qualification of Personnel, public authorities should be notified that in order to be compliant with OSHA's Commercial Diving Regulations (29 CFR Part 1910, Subpart T) dive team members must meet the qualification requirements of §1910.410, which requires appropriate commercial diver training (see attached March 29, 2000 letter from OSHA to Senator Lieberman www.adc-usa.org/OSHA_cert_recog.htm).

In consideration of this, we recommend that the NBIS list the following OSHA approved training credentials:

Training at an Association of Commercial Diving Education (ACDE) accredited school.

or

Training in accordance with the National Consensus Standard published by ANSI and ACDE (ANSI/ACDE-01-1998, Commercial Diver Training Minimum Standards).


or

Certification as an Association of Diving Contractors (ADC) Commercial Diver.

It is further recommended that public authorities be informed that Diver Training Programs by YMCA, PADI, and NAUI are not valid training credentials for NBIS underwater inspection work (see attached letters from PADI www.adc-usa.org/PADI.htm , NAUI www.adc-usa.org/NAUI.htm , and YMCA www.adc-usa.org/YMCA.html).

We would request that our committee be notified of subsequent action on this issue so we can continue to assist the FHWA in incorporating current state-of-the-art bridge inspection practices into the NBIS.

Regards,



Brian Abbott,
Civil Engineer/Commercial Diver
Chairman of ADC Civil Engineer Committee



Robert M. Snover, P.E.
Civil Engineer/Commercial Diver

/jlb
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